DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR QUALITY OPERATING PERMIT

Permit No. 195TVP01 Issue Date: September 12, 2002 Application No. 195 Expiration Date: October 11, 2007

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **Alaska Native Medical Center**, for the operation of the **Alaska Native Medical Center**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As set out in AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

All facility-specific terms and conditions of Air Quality Control Permit-to-Operate 9321-AA003 have been incorporated into this Operating Permit.

This Operating Permit becomes effective October 12, 2002.

John F. Kuterbach, Manager Air Permits Program

G:\AWQ\Awq-Permits\AIRFACS\Alaska Native Medical Center\Operating\Native Medical Center - Final Pmt & SOB.doc

Permit No. 195TVP01

Table of Contents

List of Al	bbreviations Used in this Permit	3
Section 1.	Identification	4
Section 2.	General Emission Information	5
Section 3.	Source Inventory and Description.	6
Section 4.	Emission Fees.	
Section 5.	Source-Specific Requirements	
Fuel-Buri	ning Equipment	8
Sources S	Subject to Federal New Source Performance Standards (NSPS), Subpart A, Source	
ID(s) 4 -	6	.10
Boilers S	ubject to NSPS Subpart Dc, Source ID(s) 4 - 6	.11
Volatile (Organic Liquid Storage Vessels (Tanks) Subject to NSPS Subpart Kb	.12
Section 6.	Owner Requested Limits	.13
Section 7.	Insignificant Sources	.15
Section 8.	Generally Applicable Requirements	.16
Section 9.	General Source Testing and Monitoring Requirements	.20
Section 10.	General Recordkeeping, Reporting, and Compliance Certification Requirements	.23
Section 11.	Standard Conditions Not Otherwise Included in the Permit	.27
Section 12.	Visible Emissions and PM Monitoring, Recordkeeping and Reporting	.29
Section 13.	Visible Emissions Field Data Sheet	.35
Visible E	missions Observation Record	.36
Section 14.	SO ₂ Material Balance Calculation	.37
Section 15.	ADEC Notification Form.	38

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 3 of 39

List of Abbreviations Used in this Permit

AACAlaska Administrative Code ADEC.....Alaska Department of Environmental Conservation AS.....Alaska Statutes ASTM.....American Society for Testing and Materials BACT.....Best Available Control Technology C.F.R.Code of Federal Regulations CO.....Carbon Monoxide dscf......Dry standard cubic foot EPAUS Environmental Protection Agency gr./dscf.....grain per dry standard cubic foot (1 pound = 7000 grains) GPH.....gallons per hour HAPs or HACs.....Hazardous Air Pollutants or Hazardous Air Contaminants [HAPs or HACs as defined in AS 46.14.990(14)] ID.....Source Identification Number kPa.....kiloPascals MACTMaximum Achievable Control Technology MR&R.....Monitoring, Recordkeeping, and Reporting NESHAPs.....Federal National Emission Standards for Hazardous Air Pollutants [NESHAPS as defined in 40 C.F.R. 61] NO_X.....Nitrogen Oxides NSPS.....Federal New Source Performance Standards [NSPS as defined in 40 C.F.R. 60] O_2Oxygen ppm.....Parts per million ppmv.....Parts per million by volume ppmvd.....Parts per million by volume dry PM-10Particulate Matter less than ten microns in diameter PSPerformance specification PSDPrevention of Significant Deterioration PTE.....Potential to Emit RM.....Reference Method SIC.Standard Industrial Classification SO₂.....Sulfur dioxide TPH.....Tons per hour tpy.....Tons per year VOCvolatile organic compound [VOC as defined in 18 AAC 50.990(103)] wt%.....weight percent

Permittee: Alaska Native Medical Center

Permit No. 195TVP01 Page 4 of 39

Section 1. Identification

Names and Addresses

Permittee: Alaska Native Medical Center

4315 Diplomacy Drive Anchorage, Alaska 99508

Facility Name: Alaska Native Medical Center

Location: 61° 10.994′ North; 149° 48.048′ West

Physical Address: 4315 Diplomacy Drive

Anchorage, Alaska 99508

Owner: Alaska Native Medical Center

4315 Diplomacy Drive Anchorage, Alaska 99508

Operator: Same as Owner

Permittee's Responsible Official Robert L. Wilson, Facility Engineer

Designated Agent: David N. Keith, Chief Operating Officer

4315 Diplomacy Drive Anchorage, Alaska 99508

Facility and Building Contact: Robert L. Wilson, Facility Engineer

4315 Diplomacy Drive Anchorage, Alaska 99508

(907) 729-2803 rwilson@anmc.org

Fee Contact: Robert L. Wilson, Facility Engineer

Facility Process Description: General Medical and Surgical Hospitals

SIC Code of the Facility: 8062

[18 AAC 50.350(b)(1), 1/18/97]

Final Permit

.....

•

Section 2. General Emission Information

[18 AAC 50.350(b)(1), 1/18/97]

Final Permit

Emissions of Regulated Air Contaminants, as provided in the Permittee's application:

Nitrogen oxides (NOx), carbon monoxide (CO), sulfur oxides (SOx), particulate matter (PM-10), and volatile organic compounds (VOCs).

Facility Classifications:

(1) None

Operating Permit Classifications:

(1) 18 AAC 50.325(b)(3)

Permit No. 195TVP01 Page 6 of 39

Section 3. Source Inventory and Description

[18 AAC 50.350(d)(2) 1/18/97]

Final Permit

Sources listed in Table 1 have specific monitoring, record keeping, or reporting conditions in this permit. Source descriptions and ratings are given for identification purposes only.

Table 1 - Source Inventory

ID	Source Name	Source Description	Rating/size	Installation	
				Date	
1	Emergency Diesel Generator	Caterpillar 3512TA Generator	1250 kw	1994	
2	Emergency Diesel Generator	Caterpillar 3512TA Generator	1250 kw	1994	
3	Emergency Diesel Generator	Caterpillar 3512TA Generator	1250 kw	1994	
4	Boiler # 1 (dual)	Cleaver Brooks CB 200-700 Packaged Boiler	29.3 MMBtu/hr	1994	
5	Boiler # 2 (dual)	Cleaver Brooks CB 200-700 Packaged Boiler	29.3 MMBtu/hr	1994	
6	Boiler # 3 (dual)	Cleaver Brooks CB 200-700 Packaged Boiler	29.3 MMBtu/hr	1994	
7	Tank #1	Heating Oil Tank #1	15,000 gal	1994	
8	Tank #2	Heating Oil Tank #2	15,000 gal	1994	
9	EP Tank	Emergency Power Fuel Oil Tank	20,000 gal	1994	

Page 7 of 39

Section 4. **Emission Fees**

1. **Assessable Emissions.** The Permittee shall pay to the department an annual emission fee based on the facility's assessable emissions as determined by the department under 18 AAC 50. 410. The assessable emission fee rate is set out in 18 AAC 50.410. The department will assess fees per ton of each air contaminants that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of

- 1.1 the facility's assessable potential to emit of 104 tpy; or
- 1.2 the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the department, when demonstrated by
 - an enforceable test method described in 18 AAC 50.220: a.
 - b. material balance calculations;
 - emission factors from EPA's publication AP-42, Vol. I, adopted by reference c. in 18 AAC 50.035; or
 - d. other methods and calculations approved by the department.

[18 AAC 50.410, 1/18/97 & 18 AAC 50.346(a)(1), 5/3/02]

Final Permit

- 2. **Assessable Emission Estimates.** Emission fees will be assessed as follows:
 - No later than March 31 of each year, the Permittee may submit an estimate of the 2.1 facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emission Estimate, 410 Willoughby Ave., Suite 303, Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the department can verify the estimates, or
 - If no estimate is received on or before March 31 of each year, emission fees for the 2.2 next fiscal year will be based on the potential to emit set forth in condition 1.1.

[18 AAC 50.410, 1/18/97 & 18 AAC 50.346(a)(1), 5/3/02]

Section 5. Source-Specific Requirements

Fuel-Burning Equipment

3. **Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 1 – 6 listed in Table 1 to reduce visibility through the exhaust effluent by either

a. more than 20 percent for more than three minutes in any one hour ¹, or [18 AAC 50.055(a)(1), 1/18/97, 40 CFR 52.70, 11/18/98]

b. more than 20 percent averaged over any six consecutive minutes².

[18 AAC 50.055(a)(1) & 50.346(c), 5/3/02]

Final Permit

- 3.1 For Source ID(s) 1 3, monitor, record and report according to Section 12.
- 3.2 For Source ID(s) 4 6, use only gas as primary fuel. Monitoring for these sources shall consist of a certification in each operating report required in condition 47 that each of these sources fired only gas. If operating on a back-up liquid fuel, the Permittee shall monitor, record and report according to Section 12.

[18 AAC 50.350(g) - (i), 5/3/02; 18 AAC 50.350(d)(1)(D), 6/21/98]

4. Particulate Matter. The Permittee shall not cause or allow particulate matter emitted from Source ID(s) 1 – 6 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.055(b)(1) 1/18/97 & 18 AAC 50.346(c), 5/3/02]

- 4.1 For Source ID(s) 1 3, monitor, record and report according to Section 12.
- 4.2 For Source ID(s) 4 6, use only gas as primary fuel. Monitoring for these sources shall consist of a certification in each operating report required in condition 47 that each of these sources fired only gas. If operating on a back-up liquid fuel, the Permittee shall monitor, record and report according to Section 12.

[18 AAC 50.350(g) - (i), 5/3/02; 18 AAC 50.350(d)(1)(D), 6/21/98]

5. Sulfur Compound Emissions. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from Source IDs 1 - 6 listed in Table 1 to exceed 500 ppm averaged over three hours. The Permittee shall monitor, record, and report sulfur compound emissions as follows:

[18 AAC 50.055(c), 1/18/97 & 18 AAC 50.350(d)(1)(D), 6/21/98]

¹ For purposes of this permit, the "more than three minutes in any one hour" criterion in this condition and condition 17.1 will no longer be effective when the Air Quality Control (18 AAC 50) regulation package effective 5/3/02 is adopted by the U.S. EPA.

² The six-minute average standard is enforceable only by the state until 18 AAC 50.055(a)(1), dated May 3, 2002, is approved by EPA into the SIP at which time this standard becomes federally enforceable.

Permit No. 195TVP01 Page 9 of 39

Liquid Fuel (Source IDs 1 - 6):

Monitoring and Recordkeeping -

- 5.1 The Permittee shall do one of the following for each shipment of fuel:
 - a. if the fuel grade requires a sulfur content less than 0.5% by weight, keep receipts that specify fuel grade and amount; or
 - b. if the fuel grade does not require a sulfur content less than 0.5% by weight, keep receipts that specify fuel grade and amount and
 - (i) test the fuel for sulfur content; or
 - (ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
- 5.2 Fuel testing under condition 5.1 must follow an appropriate method listed in 18 AAC 50.035 or another method approved in writing by the department.
- 5.3 If a load of fuel contains greater than 0.75% sulfur by weight, the Permittee shall calculate SO₂ emissions in PPM using either Section 14 or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).

[18 AAC 50.346(c) & 50.350(g) - (h), 5/3/02]

Final Permit

Reporting -

- 5.4 The Permittee shall report as follows:
 - a. If SO₂ emissions are calculated under 5.3 to exceed 500 ppm, the Permittee shall report under condition 45. When reporting under this condition, include the calculation under Section 14.
 - b. The Permittee shall include in the report required by condition 47
 - (i) a list of the fuel grades received at the facility during the reporting period;
 - (ii) for any grade with a maximum fuel sulfur greater than 0.5% sulfur, the fuel sulfur of each shipment; and
 - (iii) for fuel with a sulfur content greater than 0.75%, the calculated SO₂ emissions in PPM.

[18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(c), 5/3/02]

Gas Fuel (Source IDs 4 - 6):

5.5 The Permittee shall burn only pipeline quality natural gas in Source ID(s) 4 - 6.

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 10 of 39

a. Monitoring - The Permittee shall certify annually certify under condition 48 that only pipeline quality gas was burned in Source ID(s) 4 – 6 and make available to the department, upon request, the gas analysis documentation from the supplier.

[18 AAC 50.350(g), 1/18/97]

Sources Subject to Federal New Source Performance Standards (NSPS), Subpart A, Source ID(s) 4 - 6

6. NSPS Subpart A Notification. For any affected facility³ regulated under NSPS requirements in 40 C.F.R. 60, the Permittee shall furnish the department and EPA a written or electronic notification of:

[18 AAC 50.040(a)(1), 7/2/00] [40 C.F.R. 60.7, Subpart A, 7/1/99] [18 AAC 50.350(i), 1/18/97]

6.1 the date that construction or reconstruction of an affected facility commences postmarked no later than 30 days after commencement;

[40 C.F.R. 60.7(a)(1), Subpart A, 7/1/99]

6.2 the actual date of startup postmarked within 15 days after startup;

[40 C.F.R. 60.7(a)(3), Subpart A, 7/1/99]

6.3 any physical or operational change to an existing facility, which may increase the emission rate of any air pollutant except as provided in 40 CFR 60.14(e), postmarked 60 days or as soon as practicable before the change commences;

[40 C.F.R. 60.7(a)(4), Subpart A, 7/1/99]

6.4 any proposed replacement of an affected facility, for which the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, postmarked 60 days or as soon as practicable before commencement of replacement, and including the following information:

[40 C.F.R. 60.15(d), 7/1/99]

- a. the name and address of owner or operator,
- b. the location of the affected facility,
- c. a brief description of the affected facility and the components that are to be replaced,
- d. a description of the existing and proposed air pollution control equipment,
- e. an estimate of the fixed capital cost of the replacements, and of constructing a comparable entirely new facility,

³ Affected facility means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 C.F.R. 60.2, effective 7/1/98.

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 11 of 39

· ·

- f. the estimated life of the existing facility after the replacements, and
- g. a discussion of any economic or technical limitations the facility may have in complying with 40 C.F.R. 60, after the replacements.
- 7. NSPS Subpart A Startup, Shutdown, & Malfunction Requirements. The Permittee shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of Source ID(s) 4 6, any malfunctions of associated air pollution control equipment, and any periods during which a continuous monitoring system or monitoring device for Source ID(s) 4 6 is inoperative.

[18 AAC 50.040(a)(1), 7/2/00 & 40 C.F.R. 60.7(b), Subpart A, 7/1/99]

8. NSPS Subpart A Good Air Pollution Control Practice. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate Source ID(s) 4 - 6 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The department will determine whether acceptable operating and maintenance procedures are being used based on information available to the department, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance records, and inspections of Source ID(s) 4 - 6.

[18 AAC 50.040(a)(1), 7/2/00 & 40 C.F.R. 60.11(d), Subpart A, 7/1/99]

9. NSPS Subpart A Concealment of Emissions. The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of a standard set forth in condition 10. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[18 AAC 50.040(a)(1), 7/2/00 & 40 C.F.R. 60.12, Subpart A, 7/1/99]

Boilers Subject to NSPS Subpart Dc, Source ID(s) 4 - 6

10. NSPS Subpart Dc Sulfur Standards. At all times, including periods of startup, shutdown, and malfunction, for Source ID(s) 4 - 6 the Permittee shall combust distillate oil that contains less than 0.5 percent sulfur by weight.

[18 AAC 50.040(a)(2)(D), 1/18/97 & 40 C.F.R. 60.42c(d), Subpart Dc, 7/1/99]

10.1 Monitoring - Each shipment of distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specifications for distillate oil.

[40 C.F.R. 60.42c(h)(1), & 60.46c(e), Subpart Dc, 7/1/99]

10.2 Recordkeeping -

[18 AAC 50.350(h), 5/3/02]

a. record the name of the oil supplier, and a statement from the supplier that the distillate oil complies with the specifications set forth in the definition of distillate oil contained in 40 CFR 60.41c;

[40 C.F.R. 60.48c(f)(1), Subpart Dc, 7/1/99]

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 12 of 39

rago 12 or o

b. record the amount of each fuel (liquid fuel in gallons or barrels and gaseous fuel in cubic feet) combusted in Source ID(s) 4 - 6 during each calendar day.

[40 C.F.R. 60.48c(g), Subpart Dc, 7/1/99]

10.3 Reporting – Submit reports with the facility operating report required by condition 47 with a copy to EPA. The reports must meet the requirements set out in Section 10, include copies of the records required under condition 10.2 of this permit, and include the following:

[18 AAC 50.350(i), 7/2/00] [40 C.F.R. 60.48c(d), Subpart Dc, 7/1/99]

a. an explicit designation of the calendar dates covered by the report;

[40 C.F.R. 60.48c(e)(1), Subpart Dc, 7/1/99]

b. a statement setting forth the reasons for any noncompliance with the emission standards contained in condition 10 and a description of corrective actions taken to restore compliance; and

[40 C.F.R. 60.48c(e)(2), Subpart Dc, 7/1/99]

c. if fuel sulfur certifications are used to demonstrate compliance with the standards contained in condition 10, an explicit statement that the certifications represent all of the fuel combusted during the reporting period.

[40 CFR 60.48c(e)(11), Subpart Dc, 7/1/99]

Volatile Organic Liquid Storage Vessels (Tanks) Subject to NSPS Subpart Kb

11. NSPS Subpart Kb Requirements (Recordkeeping Only). For Source ID(s) 7 - 9, the Permittee shall keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the tank.

[18 AAC 50.040(a)(2)(M), 7/2/00] [40 C.F.R. 60.110b(a), (b) & (c), Subpart Kb, 7/1/99] [40 C.F.R. 60.116b(a) & (b), Subpart Kb, 7/1/99]

Permit No. 195TVP01 Page 13 of 39

Section 6. Owner Requested Limits

12. Generators. The Permittee shall not operate Source ID(s) 1 – 3 more than 660 hours in any consecutive twelve-month period, each.

[Condition 4, Operating Permit No. 9321-AA003, 3/30/94] [18 AAC 50.350(d)(1)(D), 1/18/97]

12.1 Monitoring - The Permittee shall install, operate, and maintain in good working order a continuous monitoring system for measuring hours of operation on each Source ID(s) 1 – 3.

[Condition 14, Operating Permit No. 9321-AA003, 3/30/94]

12.2 Recordkeeping – Calculate each month the total hours operated in the previous consecutive twelve-month period.

[18 AAC 50.350(g), 1/18/97]

Final Permit

12.3 Reporting - Report the total hours calculated in condition 12.2 for each month of the reporting period with the facility operating report required by condition 47.

[18 AAC 50.350(h), 5/3/02]

12.4 Report under condition 45 any consecutive twelve-month period calculation that exceeds the limit in condition 12.

[18 AAC 50.350(i), 1/18/97]

13. Boilers. The Permittee shall burn no more than 600,000 gallons of diesel in any consecutive twelve-month period in Source ID(s) 4 – 6, combined.

[Condition 5, Operating Permit No. 9321-AA003, 3/30/94] [18 AAC 50.350(d)(1)(D), 1/18/97]

13.1 Monitoring - The Permittee shall install, operate, and maintain in good working order fuel consumption meters on each Source ID(s) 4 - 6. The meters shall have an accuracy of \pm 5%.

[Condition 14, Operating Permit No. 9321-AA003, 3/30/94]

13.2 Recordkeeping – Calculate each month the total gallons of diesel burned in the previous consecutive twelve-month period.

[18 AAC 50.350(g), 1/18/97]

13.3 Reporting - Report the total gallons calculated in condition 13.2 for each month of the reporting period with the facility operating report required by condition 47.

[18 AAC 50.350(h), 5/3/02]

13.4 Report under condition 45 any consecutive twelve-month period calculation that exceeds the limit in condition 13.

[18 AAC 50.350(i), 1/18/97]

14. Boilers. The Permittee shall burn no more than 210,000,000 cubic feet of natural gas in any consecutive twelve-month period in Source ID(s) 4 - 6, combined.

[Condition 6, Operating Permit No. 9321-AA003, 3/30/94]

Issued: September 12, 2002

Permittee: Alaska Native Medical Center

Final Permit Permit No. 195TVP01 Page 14 of 39

[18 AAC 50.350(d)(1)(D), 1/18/97]

14.1 Monitoring - The Permittee shall install, operate, and maintain in good working order gas consumption meters on each Source ID(s) 4 - 6. The meters shall have an accuracy of \pm 5%.

[Condition 14, Operating Permit No. 9321-AA003, 3/30/94]

14.2 Monitoring and Recordkeeping – Calculate each month the total cubic feet of natural gas burned in the previous consecutive twelve-month period.

[18 AAC 50.350(g), 1/18/97]

14.3 Reporting - Report the total cubic feet calculated in condition 14.2 for each month of the reporting period with the facility operating report required by condition 47.

[18 AAC 50.350(h), 5/3/02]

14.4 Report under condition 45 any consecutive twelve-month period calculation that exceeds the limit in condition 14.

[18 AAC 50.350(i), 1/18/97]

Sulfur Limit. The Permittee shall not burn any diesel fuel with a sulfur content greater than 0.5%.

> [Condition 7, Operating Permit No. 9321-AA003, 3/30/94] [18 AAC 50.350(d)(1)(D), 1/18/97]

- 15.1 Monitor, record and report according to conditions 5.1 5.4b.
- 15.2 Report under condition 45 whenever the limit in condition 15 is exceeded.

[18 AAC 50.350(g) – (i), 5/3/02]

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 15 of 39

•

Section 7. Insignificant Sources

This section contains the requirements that the Permittee identified under 18 AAC 50.335(q)(2) as applicable to insignificant sources at the facility. This section also specifies the testing, monitoring, recordkeeping, and reporting for insignificant sources that the department finds necessary to ensure compliance with the applicable requirements. Insignificant sources are not exempted from any air quality control requirement or federally enforceable requirement.

As set out in 18 AAC 50.350(m), the shield of AS 46.14.290 does not apply to insignificant sources.

- **16.** For sources at the facility that are insignificant as defined in 18 AAC 50.335(q)-(v) that are not listed in this permit, the following apply:
 - 16.1 the Permittee shall submit the compliance certifications of condition 48 based on reasonable inquiry;
 - 16.2 the Permittee shall comply with the requirements of condition 27;
 - 16.3 no other monitoring, record keeping or reporting is required.

[18 AAC 50.346(b)(1), 5/3/02]

- 17. The Permittee shall not cause or allow visible emissions, excluding condensed water vapor to reduce visibility through the exhaust effluent by either;
 - 17.1 more than 20 percent for a total of more than three minutes in any one hour⁴, or [18AAC 50.055(a)(1), 1/18/97 & 40 CFR 52.70, 11/18/98]
 - 17.2 more than 20 percent averaged over any six consecutive minutes.⁵

[18 AAC 50.055(a)(1), 5/3/02]

18. The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.055(b)(1), 1/18/97 & 18 AAC 50.350(m)(3), 6/21/98]

19. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.

[18 AAC 50.055(c), 1/18/97& 18 AAC 50.350(m)(3), 6/21/98]

⁴ See Footnote 1.

⁵ See Footnote 2.

Permit No. 195TVP01 Page 16 of 39

Section 8. Generally Applicable Requirements

20. Asbestos NESHAP. The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145, 61.150, and 61.152, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.

[18 AAC 50.040(b)(3), 1/18/97] [40 C.F.R. 61, Subparts A & M, 12/19/96]

21. Refrigerant Recycling and Disposal. The Permittee shall comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F.

[18 AAC 50.040(d), 1/18/97] [40 C.F.R. 82, Subpart F, 7/1/97]

Final Permit

- 22. Good Air Pollution Control Practice.
 - 22.1 The Permittee shall do the following for Sources ID(s) 1 3:
 - a. perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
 - b. keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format;
 - c. keep a copy of either the manufacturer's or the operator's maintenance procedures.

[18 AAC 50.346(b)(2), 5/3/02]

23. Dilution. The Permittee shall not dilute emissions with air to comply with this permit.

[18 AAC 50.045(a), 1/18/97]

- **24. Reasonable Precautions to Prevent Fugitive Dust:** A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.
 - 24.1 The Permittee shall keep records of
 - a. complaints received by the Permittee and complaints received by the department and conveyed to the Permittee; and
 - b. any additional precautions that are taken
 - (i) to address complaints described in condition 24.1a or to address the results of department inspections that found potential problems; and
 - (ii) to prevent future dust problems.

[18 AAC 50.346(c), 5/3/02]

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 17 of 39

3

24.2 The Permittee shall report according to condition 27.

[18 AAC 50.350(i), 1/18/97; 18 AAC 50.346(c), 5/3/02]

25. Stack Injection. The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a source constructed or modified after November 1, 1982, unless approved in writing by the department.

[18 AAC 50.055(g), 1/18/97]

- **26. Open Burning.** The Permittee shall comply with the following requirements when conducting open burning at the facility.
 - 26.1 Open burning of asphalt, rubber products, plastics, tars, oils, oily wastes, contaminated oil cleanup materials, or other materials in a way that gives off black smoke is prohibited without written approval of the department in accordance with the procedures set forth in 18 AAC 50.065.

[18 AAC 50.065(b), 1/18/97]

26.2 Open burning or incineration of pesticides, halogenated organic compounds, cyanic compounds, or polyurethane products in a way that gives off toxic or acidic gases or particulate matter is prohibited.

[18 AAC 50.065(c), 1/18/97]

26.3 Open burning of putrescible garbage, animal carcasses, or petroleum-based materials, including materials contaminated with petroleum or petroleum derivatives, is prohibited if it causes odor or black smoke that has an adverse effect on nearby persons or property.

[18 AAC 50.065(d), 1/18/97]

26.4 Open burning is prohibited in an area if the department declares an air quality advisory under 18 AAC 50.245, stating that open burning is not permitted in that area for the day.

[18 AAC 50.065(e), 1/18/97]

26.5 When conducting open burning, ensure that:

[18 AAC 50.065(a) & 50.335(g) – (h), 1/18/97]

- a. the material is kept as dry as possible through the use of cover or dry storage;
- b. before igniting the burn, separate noncombustibles to the greatest extent practicable;
- c. natural or artificially induced draft is present;
- d. to the greatest extent practicable, separate combustibles from grass or peat layer;
- e. combustibles are not allowed to smolder; and

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 18 of 39

ago to stop

f. sufficient written records are kept to demonstrate that the Permittee complies with the limitations in this condition. Upon request of the department, submit copies of the records.

27. Air Pollution Prohibited. The Permittee shall not cause any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.

[18 AAC 50.110, 5/26/72, 1/18/97]

- 28. Monitoring, Recordkeeping, and Reporting for Air Pollution Prohibited.
 - 28.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to condition 45.
 - 28.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of condition 27.
 - 28.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
 - a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the facility have caused or are causing a violation of condition 27; or
 - b. the department notifies the Permittee that it has found a violation of condition 27.
 - 28.4 The Permittee shall keep records of
 - a. the date, time, and nature of all emissions complaints received;
 - b. the name of the person or persons that complained, if known;
 - c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of condition 27; and
 - d. any corrective actions taken or planned for complaints attributable to emissions from the facility.
 - 28.5 With each facility operating report under condition 47, the Permittee shall include a brief summary report which must include
 - a. the number of complaints received;
 - b. the number of times the Permittee or the department found corrective action necessary;

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 19 of 39

rage // Grove

- c. the number of times action was taken on a complaint within 24 hours; and
- d. the status of corrective actions the Permittee or department found necessary that were not taken within 24 hours.
- 28.6 The Permittee shall notify the department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

[18 AAC 50.346(a)(2) & 50.350(h) – (i), 5/3/02]

29. Technology-Based Emission Standard. If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235, causes emissions in excess of a technology-based emission standard⁶ listed in condition(s)10 or 21, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emission reporting required under condition 45 requires information on the steps taken to minimize emissions. The report required under condition 45 is adequate monitoring for compliance under this condition.

[18 AAC 50.235(a) & 50.350(f)(3), 1/18/97]

30. Permit Renewal. To renew this permit, the Permittee shall submit a complete application under 18 AAC 50.335 no sooner than **April 11, 2006** and no later than **April 11, 2007** to renew this permit.

[18 AAC 50.335(a), 1/18/97]

_

⁶ Technology-based emission standard means a best available control technology standard (BACT); a lowest achievable emission rate standard (LAER); a maximum achievable control technology standard established 40 C.F.R. 63, Subpart B, adopted by reference in 18 AAC 50.040(c); a standard adopted by reference in 18 AAC 50.040(a) or (c); and any other similar standard for which the stringency of the standard is based on determinations of what is technologically feasible, considering relevant factors.

Section 9. General Source Testing and Monitoring Requirements

31. Requested Source Tests. In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a), 1/18/97 & 18 AAC 50.345(a) & (k), 5/3/02]

32. Operating Conditions. Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing

[18 AAC 50.220(b) & 50.350(g), 1/18/97]

Final Permit

- 32.1 at a point or points that characterize the actual discharge into the ambient air; and
- 32.2 at the maximum rated burning or operating capacity of the source or another rate determined by the department to characterize the actual discharge into the ambient air.
- **33. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:
 - 33.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60.

[18 AAC 50.220(c)(1)(A) & 50.350(g), 1/18/97; 18 AAC 50.040(a), 7/2/00] [40 C.F.R. 60, 7/1/99]

33.2 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 61.

[18 AAC 50.040(b), 50.220(c)(1)(B) & 50.350(g), 1/18/97] [40 C.F.R. 61, 12/19/96]

33.3 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. 63.

[18 AAC 50.220(c)(1)(C) & 50.350(g), 1/18/97; 18 AAC 50.040(c), 7/2/00] [40 C.F.R. 63, 7/1/99]

33.4 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9.

[18 AAC 50.220(c)(1)(D) & 50.350(g), 1/18/97 & 18 AAC 50.030, 12/30/00]

33.5 Source testing for emissions of particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.

[18 AAC 50.220(c)(1)(E) & 50.350(g), 1/18/97 & 18 AAC 50.040(a)(4), 7/2/00] [40 C.F.R. 60, Appendix A, 7/1/99]

Issued: September 12, 2002

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 21 of 39

Tage 21 of 57

33.6 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Method 201.

[18 AAC 50.220(c)(1)(F) & 50.350(g), 1/18/97; 18 AAC 50.035(b)(2), 7/2/00] [40 C.F.R. 51, Appendix M, Method 201, 7/1/99]

33.7 Source testing for emissions of any contaminant may be determined using an alternative method approved by the department in accordance with 40 C.F.R. 63 Appendix A, Method 301.

[18 AAC 50.220(c)(2) & 50.350(g), 1/18/97; 18 AAC 50.040(c)(19), 7/2/00] [40 C.F.R. 63, Appendix A, Method 301, 7/1/99]

34. Excess Air Requirements. To determine compliance with this permit, standard exhaust gas volumes must only include the volume of gases formed from the theoretical combustion of fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68 °F and an absolute pressure of 760 millimeters of mercury).

[18 AAC 50.220(c)(3) & 50.350(g), 1/8/97; 18 AAC 50.990(88), 5/3/02]

35. Test Deadline Extension. The Permittee may request an extension to a source test deadline established by the department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the department's appropriate division director or designee.

[18 AAC 50.345(a) & (l), 5/3/02]

36. Test Plans. Except as provided in condition **39**, before conducting any source tests, the Permittee shall submit a plan to the department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance, and must specify how the source will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under condition 31 and at least 30 days before the scheduled date of any test unless the department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.

[18 AAC 50.350(b)(3) & 18 AAC 50.350(q), 1/18/97, 18 AAC 50.345(a) & (m), 5/3/02]

37. Test Notification. Except as provided in condition **39**, at least 10 days before conducting a source test, the Permittee shall give the department written notice of the date and the time the source test will begin.

[18 AAC 50.350(b)(3), 1/18/97, 18 AAC 50.345(a) & (n), 5/3/02]

38. Test Reports. Except as provided in condition **39**, within 60 days after completing a source test, the Permittee shall submit two copies of the results, to the extent practical, in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in condition 41. If requested in writing by the department, the Permittee must provide preliminary results in a shorter period of time specified by the department.

[18 AAC 50.350(b)(3), 1/18/97; 18 AAC 50.350(h) – (i) & 50.345(a) & (o), 5/3/02]

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 22 of 39

20 Test Everyntian The Demaittee is not required to comply with conditions 26, 27 and 29

39. Test Exemption. The Permittee is not required to comply with conditions 36, 37 and 38 (Test Plans, Test Notifications and Test Reports) when the exhaust is observed for visible emissions under the Method 9 Plan or Smoke/No Smoke Plan described in conditions 57.1 and 57.2.

[18 AAC 50.345(a), 5/3/02]

40. Particulate Matter Calculations. In source testing for compliance with the particulate matter standards in conditions 4 and 18, the three-hour average is determined using the average of three one-hour test runs.

[18 AAC 50.220(f) & 18 AAC 50.350(g), 1/18/97]

Section 10. General Recordkeeping, Reporting, and Compliance Certification Requirements

41. **Certification.** The Permittee shall certify all reports, compliance certifications, or other documents submitted to the department and required under the permit by including the signature of a responsible official for the permitted facility following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notarized.

[18 AAC 50.345(a) & (j), 5/3/02]

Submittals. Unless otherwise directed by the department or this permit, the Permittee shall send reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician.

[18 AAC 50.350(i), 1/18/97]

Information Requests. The Permittee shall furnish to the department, within a reasonable 43. time, any information the department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the department copies of records required to be kept by the permit. The department may require the Permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.345(a) & (i), 5/3/02]

Recordkeeping Requirements. The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:

[18 ACC 50.350(h), 5/3/02]

- 44.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
- 44.2 records of all monitoring required by this permit, and information about the monitoring including:
 - calibration and maintenance records, original strip chart or computer-based a. recordings for continuous monitoring instrumentation;
 - sampling dates and times of sampling or measurements; b.
 - the operating conditions that existed at the time of sampling or measurement; c.
 - d. the date analyses were performed;

rage 21 or o

- e. the location where samples were taken;
- f. the company or entity that performed the sampling and analyses;
- g. the analytical techniques or methods used in the analyses; and
- h. the results of the analyses.

45. Excess Emission and Permit Deviation Reports.

- 45.1 Except as provided in condition 27, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:
 - a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable;
 - b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;
 - c. report all other excess emissions and permit deviations
 - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 45.1c(ii) and 45.1c(iii);
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the department provides written permission to report under condition 45.1c(i); and
 - (iii) for failure to monitor, as required in condition 59.2b of this permit.
- 45.2 When reporting excess emissions, the Permittee must report using either the department's on-line form, which can be found at www.dec.state.ak.us/awq/excess/report.asp, or, if the Permittee prefers, the form contained in Section 15 of this permit. The Permittee must provide all information called for by the form that is used.
- 45.3 When reporting a permit deviation, the Permittee must report using the form contained in Section 15 of this permit. The Permittee must provide all information called for by the form.

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 25 of 39

rage 25 of 37

45.4 If requested by the department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2), 18 AAC 50.240(c) & 18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(a)(3), 5/3/02]

46. NSPS and NESHAP Reports. The Permittee shall:

[18 AAC 50.040 & 18 AAC 350(i)(2), 1/18/97] [40 C.F.R. 60 & 40 C.F.R. 61, 7/1/99]

- 46.1 attach to the facility operating report required by condition 47, copies of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10 as required by condition 10.3; and
- 46.2 notify the department and provide a written copy of any EPA-granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules within 30 days after receipt of a waiver or schedule.
- **47. Operating Reports.** During the life of this permit, the Permittee shall submit an original and two copies of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.
 - 47.1 The operating report must include all information required to be in operating reports by other conditions of this permit.
 - 47.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 47.1, either
 - a. The Permittee shall identify
 - (i) the date of the deviation;
 - (ii) the equipment involved;
 - (iii) the permit condition affected;
 - (iv) a description of the excess emissions or permit deviation; and
 - (v) any corrective action or preventive measures taken and the date of such actions.
 - b. when excess emissions or permit deviations have already been reported under condition 45 the Permittee may cite the date or dates of those reports.

[18 AAC 50.350(d)(4), 18 AAC 50.350(f)(3) & 18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(b)(3), 5/3/02]

47.3 The operating report must include a listing of emissions monitored under conditions 57.2c and 60.2, which trigger additional testing or monitoring, whether or

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 26 of 39

not the emissions monitored exceed an emission standard. The Permittee shall include in the report

- a. the date of the emissions;
- b. the equipment involved;
- c. the permit condition affected; and
- d. the monitoring result which triggered the additional monitoring.

[18 AAC 50.346(b)(3), 5/3/02]

48. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the department an original and two copies of an annual compliance certification report as follows:

[18 AAC 50.350(j), 1/18/97]

48.1 For each permit term and condition set forth in Section 4 through Section 10 and Section 12 including terms and conditions for monitoring, reporting, and recordkeeping:

[18 AAC 50.350(d)(4), 1/18/97 & 18 AAC 50.345(a) & (j), 5/3/02]

- a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;
- b. state whether compliance is intermittent or continuous; and
- c. briefly describe each method used to determine the compliance status; and
- d. notarize the responsible official's signature.
- 48.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

[18 AAC 50.350(j), 1/18/97]

Permit No. 195TVP01 Page 27 of 39

Section 11. Standard Conditions Not Otherwise Included in the Permit

- **49.** The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50 and, except for those terms or conditions designated in the permit as not federally-enforceable, the Clean Air Act, and is grounds for
 - 49.1 an enforcement action;
 - 49.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
 - 49.3 denial of an operating-permit renewal application.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (c), 5/3/02]

Final Permit

50. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (d), 5/3/02]

51. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (e), 5/3/02]

- **52.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are
 - 52.1 included and specifically identified in the permit; or
 - 52.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (b), 5/3/02]

53. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (f), 5/3/02]

54. The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (g), 5/3/02]

- **55.** The Permittee shall allow the department or an inspector authorized by the department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to
 - 55.1 enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 28 of 39

55.2 have access to and copy any records required by the permit;

- 55.3 inspect any facilities, equipment, practices, or operations regulated by or referenced in the permit; and
- 55.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (h), 5/3/02]

Permit No. 195TVP01 Page 29 of 39

Section 12. Visible Emissions and PM Monitoring, Recordkeeping and Reporting

For Dual Fuel-Fired Sources (Source IDs 4 – 6; <u>only</u> when operating on a back-up liquid fuel):

Visible Emissions and Particulate Matter Emissions: Monitoring, Record Keeping, and Reporting.

- **56.** The Permittee shall monitor, record and report the monthly hours of operation when operating on a back-up liquid fuel.
 - 56.1 Source ID(s) 4 6 are not subject to the liquid fuel monitoring requirements described in conditions 57 and 60 until annual operations of the sources exceed 400 hours per consecutive twelve-month period on a back-up liquid fuel. The Permittee shall annually certify compliance with conditions 3 and 4 under condition 48.
 - 56.2 The Permittee shall report under condition 45 if fuel burned other than natural gas exceeds 400 cumulative hours of operation in twelve consecutive months.
 - 56.3 The Permittee must notify the department and begin monitoring according to conditions 57 and 60 no later than 15 days after the end of a calendar month in which the cumulative hours of operation on back-up liquid fuel exceed 400 hours per consecutive twelve-month period.

[18 AAC 50.346(c) & 50.350(g) – (i), 5/3/02]

Final Permit

For Liquid-Fired Sources (Source IDs 1 - 3)

- 57. Visible Emissions Monitoring. The Permittee shall observe the exhaust of Source(s) 1 3 for visible emissions using either the Method 9 Plan under condition 57.1 or the Smoke/No-Smoke Plan under condition 57.2. The Permittee may change visible-emissions plans for a source at any time unless prohibited from doing so by condition 57.3.
 - 57.1 **Method 9 Plan.** For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.
 - a. <u>First Method 9 Observation.</u> Observe exhaust for 18 minutes within six months after the issue date of this permit or within 14 calendar days after changing from the Smoke/No-Smoke Plan of condition 57.2, whichever is later.
 - b. <u>Monthly Method 9 Observations.</u> After the first Method 9 observation, perform 18-minute observations at least once in each calendar month that a source operates.

Permit No. 1931 VPOT

c. <u>Semiannual Method 9 Observations</u>. After observing emissions for three consecutive operating months under condition 57.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions at least semiannually for 18 minutes.

Semiannual observations must be taken between four and seven months after the previous set of observations.

d. <u>Annual Method 9 Observations</u>. After at least two semiannual 18-minute observations, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.

Annual observations must be taken between 10 and 13 months after the previous observations and must include at least three 18-minute sets of observations.

- e. <u>Increased Method 9 Frequency.</u> If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that source to at least monthly intervals, until the criteria in condition 57.1c for semiannual monitoring are met.
- 57.2 **Smoke/No Smoke Plan.** Observe the exhaust for the presence or absence of visible emissions, excluding condensed water vapor.
 - a. <u>Initial Monitoring Frequency.</u> Observe the exhaust during each calendar day that a source operates.
 - b. <u>Reduced Monitoring Frequency.</u> After the source has been observed on 30 consecutive operating days, if the source operated without visible smoke in the exhaust for those 30 days, then observe emissions at least once in every calendar month that a source operates.
 - c. <u>Smoke Observed.</u> If smoke is observed, either begin the Method 9 Plan of condition 57.1 or perform the corrective action required under condition 57.3
- 57.3 **Corrective Actions Based on Smoke/No Smoke Observations.** If visible emissions are present in the exhaust during an observation performed under the Smoke/No Smoke Plan of condition 57.2, then the Permittee shall either follow the Method 9 plan of condition 57.1; or
 - a. initiate actions to eliminate smoke from the source within 24 hours of the observation:
 - b. keep a written record of the starting date, the completion date, and a description of the actions taken to reduce smoke; and

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 31 of 39

rage of or o

- c. after completing the actions required under condition 57.3a,
 - (i) take Smoke/No Smoke observations in accordance with condition 57.2
 - (A) at least once per day for the next seven operating days and until the initial 30 day observation period is completed; and
 - (B) continue as described in condition 57.2b; or
 - (ii) if the actions taken under condition 57.3a do not eliminate the smoke, or if subsequent smoke is observed under the schedule of condition 57.3c(i)(A), then observe the exhaust using the Method 9 Plan unless the department gives written approval to resume observations under the Smoke/No Smoke Plan; after observing smoke and making observations under the Method 9 Plan, the Permittee may at any time take corrective action that eliminates smoke and restart the Smoke/No Smoke Plan under condition 57.2a.
- **58. Visible Emissions Record Keeping.** The Permittee shall keep records in accordance with this condition 58.
 - 58.1 If using the Method 9 Plan of condition 57.1,
 - **a.** the observer shall record
 - (i) the name of the facility, emissions source and location, facility type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet in Section 13;
 - (ii) the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate) on the sheet at the time opacity observations are initiated and completed;
 - (iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;
 - (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emissions Observation Record in; and
 - (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 32 of 39

b. to determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be

consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet:

c. calculate and record the highest 18-consecutive-minute average observed.

- 58.2 If using the Smoke/No Smoke Plan of condition 57.2, record the following information in a written log for each observation and submit copies of the recorded information upon request of the department:
 - a. the date and time of the observation:
 - b. from Table 1 in Section 3, the ID of the source observed;
 - c. whether visible emissions are present or absent in the exhaust;
 - d. a description of the background to the exhaust during the observation;
 - e. if the source starts operation on the day of the observation, the startup time of the source;
 - f. name and title of the person making the observation; and
 - g. operating rate (load or fuel consumption rate).
- **59. Visible Emissions Reporting.** The Permittee shall report visible emissions as follows:
 - 59.1 include in each facility operating report under condition 47:
 - a. which visible-emissions plan of condition 57 was used for each source; if more than one plan was used, give the time periods covered by each plan;
 - b. for each source under the Method 9 Plan,
 - (i) copies of the observation results (i.e. opacity observations) for each source that used the Method 9 Plan, except for the observations the Permittee has already supplied to the department; and
 - (ii) a summary to include:
 - (A) number of days observations were made;
 - (B) highest six-minute average observed; and

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 33 of 39

Tomic No. 1701 VI 01

(C) dates when one or more observed six-minute averages were greater than 20 percent;

- c. for each source under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed; and
- d. a summary of any monitoring or record keeping required under conditions 57 and 58 that was not done;
- 59.2 report under condition 45:
 - a. the results of Method 9 observations that exceed an average 20 percent for any six-minute period; and
 - b. if any monitoring under condition 57 was not performed when required, report within three days of the date the monitoring was required.

[18 AAC 50.346(c) & 50.350(g) – (i), 5/3/02]

- **60. Particulate Matter Monitoring for Diesel Engines.** The Permittee shall conduct source tests on diesel engines, Source ID(s) 1 3 to determine the concentration of particulate matter (PM) in the exhaust of a source in accordance with this condition 60.
 - 60.1 Within six months of exceeding the criteria of condition 60.2a or 60.2b, either
 - a. conduct a PM source test according to conditions 31 34; or
 - b. make repairs so that emissions no longer exceed the criteria of condition 60.2; to show that emissions are below those criteria, observe emissions as described in condition 57.1 under load conditions comparable to those when the criteria were exceeded.
 - 60.2 Conduct the test according to condition 60.1 if
 - a. 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent; or
 - b. for a source with an exhaust stack diameter that is less than 18 inches, 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity that is greater than 15 percent and not more than 20 percent, unless the department has waived this requirement in writing.
 - 60.3 During each one-hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9, and calculate the average opacity that was measured during each one hour test run. Submit a copy of these observations with the source test report.

Permittee: Alaska Native Medical Center Final Permit
Permit No. 195TVP01 Page 34 of 39

60.4 The automatic PM source test requirement in condition 60.1 and 60.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM

61. Particulate Matter Reporting for Diesel Engines. The Permittee shall report as follows:

61.1 report under condition 45:

standard during this permit term.

- a. the results of any PM source test that exceeds the PM emissions limit; or
- b. if one of the criteria of condition 60.2 was exceeded and the Permittee did not comply with either condition 60.1a or 60.1b, this must be reported by the day following the day compliance with condition 60.1 was required;
- 61.2 report observations in excess of the threshold of condition 60.2b within 30 days of the end of the month in which the observations occur;
- 61.3 in each facility operating report under condition 47, include
 - a. the dates, source ID(s), and results when an observed 18-minute average was greater than an applicable threshold in condition 60.2;
 - b. a summary of the results of any PM testing under condition 60; and
 - c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 60.2, if they were not already submitted.

[18 AAC 50.346(c) & 50.350(g) – (i), 5/3/02]

Permittee: Alaska Native Medical Center

Permit No. 195TVP01 Page 35 of 39

Section 13. Visible Emissions Field Data Sheet

Certified Observe	er:				
Company:				SOURCE L	AYOUT SKETCH
Location:			 	<u>,</u>	(Emission Point
Test No.:		Date:			
	Source:				
Production Rate, Opera Unit Opera	ating Rate &				
•	observation:				Quarrers Fostion
				Sun Lo	cation Line

Clock Time	Initial		Final
Observer location Distance to discharge			
Direction from discharge			
Height of observer point			
Background description			
Weather conditions Wind Direction			
Wind speed			
Ambient Temperature			
Relative humidity			
Sky conditions: (clear, overcast, % clouds, etc.)			
Plume description: Color			
Distance visible			
Water droplet plume? (Attached or detached?)			
Other information	_		

Final Permit

Permittee: Alaska Native Medical Center Permit No. 195TVP01 ———————————————————————————————————									Page 36 of 3		
Visible En	nissio	ns Obs	ervatio	n Rec	ord						
Company Certified Observer								Page of			
Test Numbe	er				Cloc	k time		_			
Date:		Visil	bility reduc Seconds (ction every	y 15	Steam Plume (check if applicable)		Comments	Comments		
Hr	Min	0	15	30	45	Attached	Detached				
Additional in	nforma	tion:									
Observer Si	gnature	:									
Data Reduce Duration of Number of O	Observ Observa	ations									
Average Op	pacity S	Summar	· y	Ti	me			Opacity			
N	Number			Start—End			1		Average	<u> </u>	

Permit No. 195TVP01 Page 37 of 39

Section 14. SO₂ Material Balance Calculation

If the sulfur content of any fuel combusted is greater than 0.75% by weight, calculate the three-hour exhaust concentration of SO₂ using the following equations:

The $wt\%S_{fuel}$, $wt\%C_{fuel}$, and $wt\%H_{fuel}$ are equal to the weight percents of sulfur, carbon, and hydrogen in the fuel. These percentages should total 100%.

The fuel weight percent (wt%) of sulfur is obtained pursuant to condition 5.1. The fuel weight percents of carbon and hydrogen are obtained from the fuel refiner.

The volume percent of oxygen in the exhaust ($vol\%_{dry}O_{2,\,exhaust}$) is obtained from oxygen meters, manufacturer's data, or from the most recent analysis under 40 C.F.R. 60, Appendix A-2, Method 3, adopted by reference in 18 AAC 50.040(a), at the same engine load used in the calculation.

Enter all of the data in percentages without dividing the percentages by 100. For example, if $\mathbf{wt\%S_{fuel}} = 1.0\%$, then enter 1.0 into the equations not 0.01 and if $\mathbf{vol\%_{drv}O_{2.exhaust}} = 3.00\%$, then enter 3.00, not 0.03.

[18 AAC 50.350(g), 1/18/97 & 18 AAC 50.346(c), 5/3/02]

Final Permit

Permittee: Alaska Native Medical Center Final Permit Permit No. 195TVP01 Page 38 of 39 Section 15. ADEC Notification Form Fax this form to: (907) 269-7508 Telephone: (907) 269-8888 Alaska Native Medical Center Company Name Alaska Native Medical Center **Facility Name** Reason for notification: ☐ Other Deviation from Permit Condition □ Excess Emissions If you checked this box If you checked this box Fill out section 1 fill out section 2 When did you discover the Excess Emissions or Other Deviation: Date: / / Time: : Section 1. Excess Emissions (a) Event Information (Use 24-hour clock): START Time: END Time: Duration (hr:min): Date: Total: **(b)** Cause of Event (Check all that apply): ☐ UPSET CONDITION □ START UP ☐ CONTROL EQUIPMENT □ SHUT DOWN ☐ SCHEDULED MAINTENANCE ☐ OTHER Attach a detailed description of what happened, including the parameters or operating conditions exceeded. (c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No. Source Name Description Control Device

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

nittee: Alaska Native Medical Center nit No. 195TVP01		Final Permit Page 39 of 39
(f) Corrective Actions: Attach a description of corrective acminimize or eliminate chances of a	ctions taken to restore the system to recurrence.	normal operation and to
(g) Unavoidable Emissions Do you intend to assert that to	: hese excess emissions were ι	ınavoidable?
	ffirmative defense of 18 AAC 5	50.235?
ction 2. Other Permit Deviation	s	
	ved in the event, using the same identrol device or monitoring system aff	
Source ID No. Source Name	Description	Control Device
(b) Permit Condition Deviate Identify each permit condition deviate necessary. Permit Condition	tion: tion: tion or potential deviation. Attach ac Potential Deviation	dditional sheets as
(c) Corrective Actions: Attach a description of actions take recurrence.	n to correct the deviation or potentia	I deviation and to prevent
	med after reasonable inquiry, I certif document are true, accurate, and cor	•
ed Name: Signature:		Date:

Alaska Department of Environmental Conservation Air Permits Program September 12, 2002

Alaska Native Medical Center

STATEMENT OF BASIS

of the terms and conditions for

Permit No. 195TVP01

Prepared by Cynthia Espinoza and Grace Germain

Statement of Basis Final Permit
Permit No. 195TVP01 Page 2 of 20

· ·

INTRODUCTION

This document sets forth the legal and factual basis for the terms and conditions of Operating Permit No. 195TVP01.

The Alaska Native Medical Center consists of a hospital and associated medical offices for healthcare professionals.

FACILITY IDENTIFICATION

Section 1 contains information on the facility as provided in the Title V permit application. The Alaska Native Medical Center's power generation facility consists of three emergency dieselfired generators, three dual-fueled steam boilers, and three diesel storage tanks. The facility's SIC code is 8062.

The facility is owned and operated by Alaska Native Medical Center, and Alaska Native Medical Center is the Permittee for the facility's operating permit.

SOURCE INVENTORY AND DESCRIPTION

Table 1 contains information on the sources at the facility as provided in the application. Table 1 describes the sources regulated by the permit. The major sources at the Alaska Native Medical Center are three generators and three boilers installed in 1994.

The table is provided for information and identification purposes only. Specifically, the source rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

Table A contains emission information as provided in the application. A summary of the potential to emit (PTE)⁷ from the Alaska Native Medical Center is shown in the table below.

Table A - Emissions Summary, in Tons Per Year (tpy)

Pollutant	NO _x	СО	PM-10	SO ₂	VOC	Total
PTE	56.3	19.4	2.0	28.1	2.5	108
Assessable PTE	56.3	19.4	0	28.1	0	104

⁷ Potential to Emit or PTE means the maximum quantity of a release of an air contaminant, considering a facility's physical or operational design, based on continual operation of all sources with the facility for 24 hours a day, 365 days a year, reduced by the effect of pollution control equipment and approved State or federal limitations on the capacity of the facility's sources or the facility to emit an air contaminant, including the limitations such a restrictions on hours of rate of operation and type or amount of material combusted, stored, or processed...as defined in AS 46.14.990(21), effective 1/18/97.

Statement of Basis Final Permit Permit No. 195TVP01 Page 3 of 20

· ·

The assessable PTE listed under condition 1.1 is the sum of the emissions of each individual regulated air contaminant for which the facility has the potential to emit quantities greater than 10 tpy.

The PTE were calculated using AP-42 emission factors and operational limits.

BASIS FOR REQUIRING AN OPERATING PERMIT

Section 2 includes a description of the regulatory classifications of the Alaska Native Medical Center. The Permittee has requested that the department limit operations of its three diesel-fired generators and three dual-fueled steam boilers in order to preclude review under the Prevention of Significant Deterioration (PSD) provisions of the State regulations.

This facility could be classified under 18 AAC 50.300(d) because it is located in an area designated as nonattainment under 18 AAC 50.015 and has the potential to emit 100 tpy or more of the nonattainment air contaminant. The facility is located in Anchorage urban area, which is identified as nonattainment for CO. However, ANMC requested operational limits in the facility to avoid such classification. Without the limits, the facility could emit more than 100 tpy of CO. It requires an operating permit under 18 AAC 50.325(b)(3) because it contains a source subject to one or more of the standards adopted by reference in 18 AAC 50.040(a) – (c).

Alaska regulations require operating permit applications to include identification of "regulated sources." As applied to Alaska Native Medical Center, the State regulations require a description of:

- ⇒ Each source regulated by a standard in 18 AAC 50.055, Industrial Processes and Fuel Burning Equipment, under18 AAC 50.335(e)(4)(C);
- \Rightarrow Each source subject to a standard adopted by reference in 18 AAC 50.040 under 18 AAC 50.335(e)(2); and
- \Rightarrow Sources subject to requirements in an existing department permit 18 AAC 50.335(e)(5).

The emission sources at Alaska Native Medical Center classified as "regulated sources" according to the above department regulations are listed in Table 1 of Operating Permit No. 195TVP01.

CURRENT AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

The most recent permit issued for this facility is permit-to-operate number 9321-AA003. This permit-to-operate includes all construction authorizations issued through March 30, 1994, because it was issued before January 18, 1997. All facility-specific requirements established in this previous permit are included in the new operating permit as described in Table B.

Statement of Basis Final Permit
Permit No. 195TVP01 Page 4 of 20

Construction Permits

No construction permits have been issued for this facility after January 18, 1997 (the effective date of the new divided operating and construction-permitting program).

Title V Operating Permit Application History

The owner or operator submitted an application on November 28, 1997.

COMPLIANCE HISTORY

The facility has operated at its current location since 1994. Review of the permit files for this facility, which includes the past inspection reports indicate a facility generally operating in compliance with its operating permit, except as follows:

Based on inspection conducted by ADEC on April 21, 2000, the three boilers (Source IDs 4-6) were determined to be 40 CFR 60 Subpart Dc boilers. ANMC failed to fulfill the NSPS notification and initial performance demonstrations requirements per 40 CFR 60.7 and 40 CFR 60.44c in due time.

FACILITY-SPECIFIC REQUIREMENTS CARRIED FORWARD

State of Alaska regulations in 18 AAC 50.350(d)(1)(D) require that an operating permit include each facility-specific requirement established in a prior construction permit. Table B below lists the new condition in Operating Permit No. 195TVP01 that carries the old requirement into the new permit.

Table B - Comparison of Pre-January 18, 1997 Permit No. 9321-AA003 Conditions to Operating Permit No. 195TVP01 Conditions ⁸

Permit No.	Description of	Permit No. 195TVP01	How condition was revised
9321-AA003	Requirement	Condition Number	
Condition			
number			
4	660 hr/yr limit for	12	Limit was carried forward.
	each Source ID(s)		
	1 - 3.		
5	600,000 gal/yr	13	Limit was carried forward.
	diesel limit for		
	Source $ID(s) 4 - 6$		
	combined.		
6	2.1E+08 scf/yr	14	Limit was carried forward.
	natural gas limit		
	for Source ID(s) 4		
	– 6 combined.		
7	Diesel fuel sulfur	15	Limit was carried forward.

⁸ This table does not include all standard and general conditions

-

Issued: September 12, 2002 Expires: October 11, 2007

Final Permit Page 5 of 20

Statement of Basis Permit No. 195TVP01

Permit No. 9321-AA003 Condition number	Description of Requirement	Permit No. 195TVP01 Condition Number	How condition was revised
14 and Exhibit	content limit of 0.5%. Process monitors shall be	12.1, 13.1, 14.1	Requirements were carried forward.
C	installed		forward.
Exhibit C	Report diesel fuel content for each fuel delivery	5.1	Requirement was carried forward.

r ago o o a zo

LEGAL AND FACTUAL BASIS FOR THE PERMIT CONDITIONS

Legal Basis: The State and federal regulations for each condition are cited in Operating Permit No. 195TVP01.

Conditions 1 - 2, Emission Fees

Applicability: The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These standard conditions require the Permittee to pay fees in accordance with the department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date.

The default assessable emissions are emissions of each air contaminant authorized by the permit (AS 46.14.250(h)(1)(A)). Air contaminant means any regulated air contaminant and any hazardous air contaminant. Therefore, assessable emissions under 18 AAC 50.250(h)(1)(A) means the **potential to emit** any air contaminant identified in the permit, including those not specifically limited by the permit. For example, hydrogen chloride (HCl) emissions from an incinerator are assessable emissions because they are a hazardous air contaminant, even if there is currently no emission limit on HCl for that class of incinerator.

The conditions also describe how the Permittee may calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air contaminant. Therefore, fees based on actual emissions must also be paid on any contaminant emitted whether or not the permit contains any limitation of that contaminant.

This standard condition specifies that, unless otherwise approved by the department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match. The Permittee will normally pay for actual emissions - just with a one-year time lag.

Projected actual emissions may differ from the previous year's actual emissions if there is a change at the facility, such as changes in equipment or an emission rate from existing equipment.

If the Permittee does not choose to annually calculate assessable emissions, emissions fees will be based on "potential to emit" (PTE).

The PTE set forth in the condition is based on 0.5% by weight sulfur content. If the actual sulfur content of the fuel is greater than this assumption, the assessable emissions calculations provided by the Permittee should reflect the actual sulfur content.

Condition 3 and Section 12, Visible Emissions Standard

Applicability: The visible emission standard applies to operation of all fuel-burning equipment in Alaska. Source ID(s) 1 - 6 are fuel-burning equipment.

Factual basis: Condition 3 requires the Permittee to comply with the federal and the state visible emission standards applicable to fuel-burning equipment and incinerators. The Permittee shall not cause or allow the equipment to violate these standards.

This condition has recently been adopted into regulation as a standard condition.

Gas Fired:

<u>Monitoring</u> – The monitoring of gas fired sources for visible emissions is waived, i.e. no source testing will be required. The department has found that natural gas fired equipment inherently has negligible PM emissions. However, the department can request a source test for PM emissions from any smoking equipment.

<u>Reporting</u> – The Permittee must annually certify that only gaseous fuels are used in the equipment.

Liquid Fired:

<u>Monitoring</u> — The visible emissions may be observed by either Method-9 or the Smoke/No Smoke plans as detailed in Section 12. Corrective actions such as maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

<u>Recordkeeping -</u> The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

<u>Reporting -</u> The Permittee is required to report: 1) emissions in excess of the federal and the state visible emissions standard, 2) and deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the facility operating report.

For Source ID(s) 4 - 6, the dual-fuel fired boilers, liquid-fuel monitoring is waived in accordance with recently issued Department Guidance AWQ 02-014 until annual operations of the source exceed 400 hours on liquid fuel per calendar year. Monitoring consists of an annual compliance certification with the opacity and particulate matter standards. If the 400-hour-per-calendar-year limit is exceeded, then the Permittee must comply with the MR&R for liquid-fired sources as described in conditions 57 through 61.

Condition 4 and Section 12, Particulate Matter (PM) Standard

Applicability: The PM standard applies to operation of all fuel burning equipment in Alaska. Source ID(s) 1 - 6 are fuel-burning equipment.

Factual basis: Condition 4 requires the Permittee to comply with the state PM (also called grain loading) standard applicable to fuel-burning equipment. The Permittee shall not cause or allow fuel-burning equipment to violate this standard.

This condition has recently been adopted into regulation as a standard condition.

Gas Fired:

<u>Monitoring</u> – The monitoring of gas fired sources for particulate matter is waived, i.e. no source testing will be required. The department has found that natural gas fired equipment inherently has negligible PM emissions. However, the department can request a source test for PM emissions from any smoking equipment.

<u>Reporting</u> – The Permittee must annually certify that only gaseous fuels are used in the equipment.

Liquid Fired:

<u>Monitoring</u> – The Permittee is required to conduct PM source testing if threshold values for opacity are exceeded.

<u>Recordkeeping</u> - The Permittee is required to record the results of PM source tests.

<u>Reporting -</u> The Permittee is required to report: 1) incidents when emissions in excess of the opacity threshold values have been observed, 2) and results of PM source tests. The Permittee is required to include copies of the results of all visible emission observations with the facility operating report.

For Source ID(s) 4 - 6, the dual-fuel fired boilers, liquid-fuel monitoring is waived in accordance with recently issued Department Guidance AWQ 02-014 until annual operations of the source exceed 400 hours on liquid fuel per calendar year. Monitoring consists of an annual compliance certification with the opacity and particulate matter standards. If the 400-hour-per-calendar-year limit is exceeded, then the Permittee must comply with the MR&R for liquid-fired sources as described in conditions 57 through 61.

The Permittee provided the exhaust stack diameter of each Source ID(s) 1 – 6 and are as follows: Source ID(s) 1 – 3 (generators), three identical units with a 14 inch stack diameter; Source ID(s) 4 – 6 (boilers), three identical units with a 42 inch stack diameter.

Condition 5, Sulfur Compound Emissions

Applicability: The sulfur emission standard applies to operation of all fuel-burning equipment in the State of Alaska. Source ID(s) 1 - 6 are fuel-burning equipment. The SIP standard for sulfur dioxide applies because it is contained in the federally approved SIP dated October, 1983. Monitoring of sulfur dioxide emissions is accomplished by analysis of fuel sulfur content.

Factual basis: The condition requires the Permittee to comply with the sulfur emission standard applicable to fuel-burning equipment. The Permittee may not cause or allow their equipment to violate this standard.

Monitoring -

Liquid Fuel (Fuel Oil): Fuel Oil sulfur is measured in weight percent sulfur (wt% S). Calculations show that fuel containing no more than 0.5 wt% S will always comply with the emission standard. This is true for all liquid hydrocarbon fuels, even with no excess air. Verification of the ASTM fuel oil grade as No. 1 or No. 2 fuel oil (DF-1 or DF-2) will certify compliance with the standard because these fuel oils always have a fuel sulfur content of no more than 0.5 wt% S. For fuels with a sulfur content higher than 0.75 wt% S, this condition requires the Permittee to use the equations in Section 14 to calculate the exhaust gas SO₂

Statement of Basis Final Permit
Permit No. 195TVP01 Page 9 of 20

concentration, showing whether the standard was exceeded. The equations in Section 14 are

Gas Fuel: Fuel gas sulfur is measured as hydrogen sulfide (H_2S) concentration in ppm by volume (ppmv). Calculations ¹⁰ show that fuel gas containing no more than 4000 ppm H_2S will always comply with this emission standard. This is true for all fuel gases, even with no excess air.

Equations to calculate the exhaust gas SO_2 concentrations resulting from the combustion of fuel gas were not included in this permit. Fuel gas with an H_2S concentration of even 10 percent of 4000 ppm is currently not available in Alaska and is not projected to be available during the life of this permit.

Alaska Native Medical Center has notified the department that the facility is burning only pipeline quality natural gas, which has historically low H₂S levels (non-detect). Therefore the requirement for the Permittee is to only burn "pipeline quality natural gas"

<u>Recordkeeping</u> - For Diesel fuel the Permittee is required to record the fuel sulfur content or fuel grade of each shipment and all material balance calculations. No recordkeeping is required for pipeline quality natural gas.

<u>Reporting</u> – The Permittee is required to report as "State" excess emissions whenever the fuel combusted causes sulfur compound emissions to exceed the standards in this condition. The Permittee is required to include the material balance calculations for fuel oil in the excess emissions report.

The Permittee is required to include copies of the records mentioned in the recordkeeping paragraph with the facility operating report. For gas fuel the Permittee shall certify compliance annually.

Conditions 6 – 9, NSPS Subpart A Requirements

all based on stoichiometric mass balance. 9

Applicability: The department has incorporated by reference the NSPS effective July 1, 1999, for specific industrial activities, as listed in 18 AAC 50.040. However, EPA has not delegated to the department the authority to administer the NSPS program as of December 12, 2001.

Factual Basis: Subpart A contains the general requirements applicable to all affected facilities (sources) subject to NSPS. In general the intent of NSPS is to provide technology-based emission control standards.

Most (with the exception of some storage tanks) sources subject to an NSPS standard are subject to Subpart A. At this facility, Source ID(s) 4 – 6 are subject to NSPS Subpart Dc and therefore subject to Subpart A.

The Permittee has already complied with the notification requirements in **40 C.F.R. 60.7(a)(1) - (4)** for the existing NSPS sources subject to Subpart A. However, the Permittee is still subject to these requirements in the event of a new NSPS source or reconstruction of an existing NSPS source.

_

Issued: September 12, 2002

http://www.state.ak.us/dec/dawq/aqm/newpermit.htm

¹⁰ See ADEC Air Permits Web Site at http://www.state.ak.us/dec/dawq/aqm/newpermit.htm, under "Stoichiometric Mass Balance Calculations of Exhaust Gas SO₂ Concentration.

Tago to di Ex

The requirements to notify the EPA and the department of the date of a continuous monitoring system of performance demonstration, no less than 30 days before demonstration commences (40 C.F.R. 60.7(a)(5)) are applicable to existing NSPS sources subject to Subpart A. The requirements to notify the EPA and the department of any proposed replacement of an affected facility (40 C.F.R. 60.15) apply in the event of a proposed replacement. (See condition 6)

Record maintenance requirements in **40 C.F.R. 60.7(b)** are applicable to all NSPS sources subject to Subpart A. (See condition 7)

Recordkeeping requirements in **40** C.F.R. **60.7**(**f**) are applicable to all NSPS sources. (Satisfied by condition 41)

The Permittee has already complied with the initial performance test requirements in **40 C.F.R. 60.8** for the existing NSPS sources. (See letter to EPA dated March 1, 2002.)

Good air pollution control practices in **40 C.F.R. 60.11** are applicable to all NSPS sources subject to Subpart A. (See condition 8)

Condition 10, NSPS Subpart Dc Requirements

Applicability: NSPS Subpart Dc applies to steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989 and have maximum design heat input capacities of 29 MW (100 MMBtu/hr) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). Source ID(s) 4 – 6 were installed in 1994, and have maximum design heat input capacities of 29.3 MMBtu/hr; and are therefore subject to Subpart Dc. Source ID(s) 4 – 6 burn oil and are subject to the standard for sulfur dioxide in 40 C.F.R. 60.42c(d). Source ID(s) 4 – 6 are not subject to the PM standard of Subpart Dc.

Factual Basis: The condition requires the Permittee to comply with the Subpart Dc sulfur standard. The Permittee may not cause or allow Source ID(s) 4 – 6 to violate this standard. The Permittee has two options, one is to comply with a sulfur emission limit and the other is to comply with a fuel sulfur limit.

<u>Monitoring</u> - The condition describes monitoring required in the event that the owner seeks to demonstrate compliance with the SO_2 standard based on fuel supplier certification under 40 C.F.R. 60.46c(e) and 4 CFR 60.42c(h)(1).

Condition 11, NSPS Subpart Kb Requirements (Recordkeeping Only)

Applicability: NSPS Subpart Kb applies to source that were built or modified after July 23, 1984. Source ID(s) 7 - 9 were built in 1994. Source ID(s) 7 - 8 have storage capacities of 15, 000 gallons each, Source ID 9 has storage capacity of 20,000 gallons, and the three tanks store volatile organic liquids (VOLs) with a maximum true vapor pressure of less than 3.5 Kpa. Since the tanks have either: (1) a capacity greater than 40,000 gallons, but a maximum true vapor pressure less than 3.5 Kpa (0.5 psia); or (2) have a capacity between 20,000 and 40,000 gallons, but a maximum true vapor pressure less than 15 kPa (2.2psia) they are subject to only the recordkeeping requirements in 40 C.F.R. Subpart Kb, 60.116b(a) & (b).

1 age 11 of 20

Factual Basis: This condition incorporates Subpart Kb recordkeeping requirements. Because the condition is a permanent recordkeeping condition, no monitoring or reporting is required to ensure compliance with these federal requirements.

Conditions 12 - 15, Owner Requested Limits

Applicability: Implementation of these operating limits will ensure that emissions of nitrogen oxides (NO_x) and Carbon Monoxide (CO) will remain below 250 tpy and 100 tpy, respectively.

Factual Basis: The Permittee has requested that the department limit operation of its three diesel-fired generators, and three dual-fueled steam boilers in order to preclude review under the Prevention of Significant Deterioration (PSD) provisions of the State regulations and to avoid CO nonattainment classification under 18 AAC 50.300(d). The facility has potential emissions of 250 tpy or more of NOx and 100 tpy or more of CO without these limits.

The Permittee submitted a complete application requesting these operating limits on November 22, 1993 and February 14, 1994.

Conditions 16 - 19, Insignificant Sources

Applicability: These state regulations apply because the Permittee is subject to the requirements in 18 AAC 50.055 (a)(1), 18 AAC 50.055 (b)(1), 18 AAC 50.055 (c)(1) and 18 AAC 50.055 (a)(1) as amended on May 3, 2002.

Factual basis: The department will use these standard conditions in any operating permit unless the department determines that source or facility specific conditions more adequately meet the requirements of 18 AAC 50. The department finds that the insignificant sources at this facility do not need specific monitoring, recordkeeping and reporting to ensure compliance under condition 16. Condition 16 requires certification that the sources did not exceed state emission standards during the previous year and did not emit any prohibited air pollution.

The general emission standards in conditions 17 through 19 apply to all industrial processes and fuel-burning equipment. Incinerators burning less than 1000 lb/hr are not subject to condition 18.

Condition 16 requires certification that the sources did not exceed state emission standards during the previous year and did not emit any prohibited air pollution. The general emission standards in conditions 17 through 19 apply to all industrial process industrial processes and fuel-burning equipment. Incinerators burning less than 1000 lb/hr are not subject to condition 18.

State air quality regulations adopted effective May 3, 2002 allow for an average six minute opacity observation. The existing regulation, limiting opacity to no more than 20% for more than 3 minutes in any one hour, is included because EPA Region X has not formally approved the changed opacity regulation as part of Alaska's State Implementation Plan (SIP).

The conditions re-iterate the general standards and require some compliance for insignificant sources. The Permittee may not cause or allow their equipment to violate these standards. Insignificant sources are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance.

Jacobsky Contember 12, 2003

Condition 20, Asbestos NESHAP

Applicability: The asbestos demolition and renovation requirements apply if the Permittee engages in asbestos demolition or renovation.

Factual Basis: The condition requires the Permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R. 61, Subpart M. Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Condition 21, Refrigerant Recycling and Disposal

Applicability: Applies if the Permittee engages in the recycling or disposal of certain refrigerants.

Factual Basis: The condition requires the Permittees to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F, that will apply if the Permittee uses certain refrigerants. Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Condition 22, Good Air Pollution Control Practice

Applicability: Applies to all sources.

Factual basis: The department will use this standard condition in any operating permit unless the department determines that source or facility specific conditions more adequately meet the requirements of 18 AAC 50. Maintaining and operating equipment in good working order is fundamental to preventing unnecessary or excess emissions. Standard conditions for monitoring compliance with emission standards are based on the assumption that good maintenance is performed. Without appropriate maintenance, equipment can deteriorate much more quickly, and periodic monitoring that is not continuous would be needed much more frequently to be sure that it is representative.

Records should be kept and available to the department. Records of deferred maintenance can be a reasonable trigger for requesting source testing.

For most existing equipment, the department does not specify that the Permittee must follow manufacturer's recommendations. If the manufacturer's recommendations are not suitable for Alaskan conditions, or don't relate to minimizing emissions, the Permittee can see that they are changed as a condition of purchase for existing equipment.

Condition 23, Dilution

Applicability: This State regulation applies to the Permittee because the Permittee is subject to emission standards in 18 AAC 50.

Factual Basis: The condition prohibits the Permittee from diluting emissions as a means of compliance with any standard in 18 AAC 50.

Condition 24, Reasonable Precautions to Prevent Fugitive Dust

Applicability: This condition applies to operating permits for facilities containing one of the following sources: coal-fired boilers; coal handling facilities; construction of gravel pads or roads that are part of a permitted facility or other construction that has the potential to generate fugitive dust that reaches ambient air; commercial/industrial/municipal solid waste, air curtain, and medical waste incinerators; sewage sludge incinerators not using wet methods to handle that ash; mines; urea manufacturing; soil remediation units; or dirt roads under the control of the operator with frequent vehicle traffic.

Factual Basis: While the department agrees that ANMC does not engage primarily in such activities, the department also considers that ANMC has the potential to engage in construction projects that may cause fugitive emissions.

The underlying regulations are 18 AAC 50.350 and 18 AAC 50.346. Require the Permittee to take reasonable action to prevent particulate matter (PM) from being emitted into the ambient air.

Not all facilities have the potential to generate fugitive dust during the life of the permit. The department will determine whether precautions are reasonable based on a variety of factors, including the distance to the facility boundaries, nature and content of the dust, proximity to neighbors, and the nature of the activity. This condition applies to the types of sources or activities that are likely to generate fugitive dust as identified above. It allows the precautions that are identified under the permit to be appropriate and specific to the activities conducted by the Permittee.

Condition 25, Stack Injection

Applicability: Stack injection requirements apply to the facility because the facility contains a stack or source constructed or modified after November 1, 1982.

Factual Basis: The condition prohibits the Permittee from releasing materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack (i.e. disposing of material by injecting it into a stack). No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the source or stack would need to be modified to accommodate stack injection.

Condition 26, Open Burning

Applicability: The open burning State regulation in 18 AAC 50.065 applies to the Permittee if the Permittee conducts open burning at the facility.

Factual Basis: The condition requires the Permittee to comply with the regulatory requirements when conducting open burning at the facility.

No specific monitoring is required for this condition. Condition 26.5f requires the Permittee to keep "sufficient records" to demonstrate compliance with the standards for conducting open burning, but does not specify what these records should contain.

rage in a ze

More extensive monitoring and recordkeeping is not warranted because the Permittee does not conduct open burning as a routine part of their business. Also, most of the requirements are prohibitions, which are not easily monitored. Additional monitoring is achieved through condition 27, which requires a record of complaints. Therefore, the department does not believe that additional monitoring is warranted.

Condition 27, Air Pollution Prohibited

Applicability: Air Pollution Prohibited requirements apply to the facility because the facility will have emissions.

Factual Basis: The condition prohibits the Permittee from causing any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints and to submit copies of these records upon request of the department.

The department will determine whether the necessary actions were taken. No corrective action are necessary if the complaint is frivolous or there is not a violation of 18 AAC 50.110, however this condition is intended to prevent the Permittee from prejudging that complaints are invalid.

Condition 29, Technology-Based Emission Standard

Applicability: Technology Based Emission Standard requirements apply to the facility because the facility contains equipment subject to a technology-based emission standard, such as BACT, MACT, NSPS or other "technologically feasible" determinations. For this facility, the 0.5% fuel sulfur content as stated in condition 15 is the Technology-based Emission Standard.

Factual Basis: The Permittee is required to take reasonable steps to minimize emissions if certain activity causes exceedance of any technology-based emission standard in this permit. The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with condition 45. Excess emission reporting under condition 45 requires information on the steps taken to minimize emissions, the report required under condition 45 is adequate monitoring for compliance with this condition.

Condition 30, Permit Renewal

Applicability: Applies if the Permittee intends to renew the permit.

Factual Basis: The Permittee is required to submit a complete application for permit renewal by the specific dates applicable to Alaska Native Medical Center as listed in this

1 dg0 10 01 20

condition. Alaska Native Medical Center. Monitoring, recordkeeping, and reporting for this condition consist of the application submittal. No additional requirements are necessary to ensure compliance with this condition.

Condition 31, Requested Source Tests

Applicability: Applies because this is a standard condition to be included in all permits.

Factual Basis: The Permittee is required to conduct source tests as requested by the department. Monitoring consists of conducting the requested source test, and no recordkeeping or reporting requirements are necessary to ensure compliance with this condition.

Conditions 32 - 34, Operating Conditions, Reference Test Methods, Excess Air Requirements

Applicability: Applies if the Permittee is required to conduct source tests by this permit.

Factual Basis: The Permittee is required to conduct source test as set out in conditions 32 - 34. These conditions supplement the specific monitoring requirements stated elsewhere in this permit. The test reports required by condition 38 adequately monitor compliance with conditions 32 - 34, therefore no additional MR&R requirements are necessary to ensure compliance with these conditions.

Conditions 35 - 39, Test Deadline Extension, Test Plans, Notification, Reports & Exemption

Applicability: Apply because the Permittee is required to conduct source test by this permit.

Factual Basis: Standard condition 18 AAC 50.345(a) is incorporated through conditions 36 - 39. Because these standard condition supplements specific monitoring requirements stated elsewhere in this permit, no MR&R is required. The source test itself is adequate to monitor compliance with this condition.

Condition 40, Particulate Matter (PM) Calculations

Applicability: Applies when the Permittee tests for compliance with the PM standard.

Factual Basis: The condition incorporates a regulatory requirement for PM source tests. The Permittee must use the equation given in this condition to calculate the PM emission concentration from the source test results. Because this condition supplements specific monitoring requirements stated elsewhere in this permit, no MR&R is required to ensure compliance with this condition.

Condition 41, Certification

Applicability: This is a standard condition to be included in all permits. Applies because every permit requires the Permittee to submit reports.

rage to 0.20

Factual Basis: This condition requires the Permittee to certify all reports submitted to the department. To ease the certification burden on the Permittee, the condition allows the excess emission reports to be **certified** with the facility report, even though it must still be **submitted** more frequently than the facility operating report. This condition supplements the reporting requirements of this permit, therefore no additional MR&R is necessary to ensure compliance with this condition.

Condition 42, Submittals

Applicability: Applies because the Permittee is required to send reports to the department.

Factual Basis: This condition requires the Permittee to send submittals to the address specified in this condition. Receipt of the submittal at the correct department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of this permit, therefore no additional MR&R is necessary to ensure compliance with this condition.

Condition 43, Information Requests

Applicability: Applies to all Permittees, and incorporates a standard condition

Factual Basis: This condition incorporates a standard condition in regulation, which requires the Permittee to submit information requested by the department. Receipt of the requested information is adequate monitoring.

Condition 44, Recordkeeping Requirements

Applicability: Applies because the Permittee is required by the permit to keep records.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide adequate evidence of compliance with this requirement, therefore, no additional MR&R is required.

Condition 45, Excess Emission and Permit Deviation Reports

Applicability: Applies when the emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two State regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The condition does not mandate the use of the department's reporting form, but it does specify that the information listed on the form must be included in the report.

The reports themselves and the other monitoring records required under this permit provide an adequate monitoring of whether the Permittee has complied with the condition. Therefore, no additional MR&R is necessary to ensure compliance with this condition.

Statement of Basis Final Permit
Permit No. 195TVP01 Page 17 of 20

Please note that there may be additional federally required excess emission reporting requirements.

Table C - List of State Excess Emission and Permit Deviation Reporting Requirements 11

Condition	Description
5.4a	Whenever the fuel combusted causes sulfur compound emissions to exceed the standard of condition 5
12.4	Any consecutive twelve-month period calculation that exceeds the limit in condition 12.
13.4	Any consecutive twelve-month period calculation that exceeds the limit in condition 13.
14.4	Any consecutive twelve-month period calculation that exceeds the limit in condition 14.
15.2	Whenever the limit in condition 15 is exceeded.
28.1 & 45.1a(i)	Any time emissions present a potential threat to human health or safety.
45.1a(ii)	Excess emissions that the Permittee believes to be unavoidable.
45.1c(ii)	if a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery
56.2	For source $ID(s)$ 4 – 6, if fuel burned other than natural gas exceeds 400 cumulative hours of operation in twelve consecutive months.
59.2a	Any time the results of Method 9 observations exceeds an average 20 percent for any six-minute period
59.2b & 45.1c(iii)	If any monitoring under condition 57 was not performed when required.
61.1	The results of a source test for particulate matter exceeds the particulate matter emission limit.
	If one of the criteria of condition 60.2 was exceeded and the Permittee did not comply with either condition 60.1a or 60.1b

Condition 46, NSPS and NESHAP Reports

Applicability: Applies to facilities subject to NSPS and NESHAP federal regulations.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60, 40 C.F.R. 61, and 40 C.F.R. 63. The permit does not need any MR&R. The reports themselves are adequate monitoring for compliance with this condition.

¹¹ This table is for informational purposes. It does not relieve the Permittee of any requirements stated in Operating Permit 195TVP01.

Issued: September 12, 2002

Statement of Basis Final Permit Permit No. 195TVP01 Page 18 of 20

Condition 47, Facility Operating Reports

Applicability: Applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit and does not need any MR&R. The reports themselves are adequate monitoring for compliance with this condition.

Table D - List of Documents to be Attached to the Facility Operating Report 12

Condition	Parameter	Description	
3.2 & 4.2	Fuel gas	certification that the sources burned only natural gas	
5.4b		The fuel sulfur content records or the fuel grade of each shipment.	
	content	All material balance calculations.	
10.3	Subpart Dc sulfur reporting	Name of the oil supplier, statement from the supplier, amount of each type of fuel.	
12.3	Hours of operation	Hours operated in the previous consecutive twelve-month period for Source $ID(s)$ 1 – 3.	
13.3	Diesel consumption	Gallons of diesel burned in the previous consecutive twelve-month period for Source $ID(s)$ 4 – 6.	
14.3	Natural gas consumption	Cubic feet of natural gas burned in the previous consecutive twelve-month period for Source $ID(s)$ 4 – 6.	
28.5(Air	Emissions that	Include with the facility operation report a brief summary of:	
Pollution Prohibited)	present a threat to human health or	> Number of complaints received,	
safety	> The number of complaints found by the Permittee or the department to be valid,		
		➤ The number of complaints for which the Permittee tool corrective action within 24 hours, and	
		> The status of the complaints not corrected within 24 hours.	
41	Certification	The excess emission and permit deviation reports submitted under condition 44 may be certified with the facility operating report	
46.1	NSPS/NESHAPs sources	Copies on any NSPS and NESHAPs reports submitted to EPA Region 10 as required by condition 10.3.	
47.2	excess emissions or permit deviations	summary of excess emissions or permit deviations during the reporting period that are not reported under condition 47.1	

¹² See footnote 11.

Statement of Basis
Permit No. 195TVP01
Final Permit
Page 19 of 20

Condition	Parameter	Description
59.1	Visible Emissions	Identification of which visible emission plan for each source.
		For the Method 9 Plan, copies of the observation results.
		For each source under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed.
		A summary of any monitoring or record keeping required under conditions 57 and 58 that was not done
61.3	Particulate Matter	The dates, source ID(s), and results when an observed 18-minute average was greater than an applicable threshold in condition 60.2;
		A summary of the results of any PM testing under condition 60; and copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 60.2, if they were not already submitted.

Condition 48, Annual Compliance Certification

Applicability: Applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Because this requirement is a report, no MR&R is needed.

Conditions 49 - 55, Standard Conditions

Applicability: Applies because these are standard conditions to be included in all

permits.

Factual Basis: These are standard conditions required for all operating permits.

Conditions 56 - 61, Visible Emissions and PM Monitoring, Recordkeeping and Reporting

Applicability: Applies because these conditions detail the monitoring, recordkeeping, and reporting required in conditions 3 and 4.

Factual Basis: These conditions have recently been adopted into regulation as a standard condition.

Each permit term and condition must include monitoring, recordkeeping and reporting for the Permittee to show verifiable compliance with each permit term and condition. The Permittee must establish by actual visual observations which can be supplemented by other means, such as a defined Facility Operation and Maintenance Program, that the facility is in continuous compliance with the State's emission standards for visible emissions and particulate matter. The correlation between particulate matter and visible emissions that is the basis for this monitoring procedure is discussed under conditions 3 and 4.

Statement of Basis
Permit No. 195TVP01
Fage 20 of 20

These conditions detail a stepwise process for monitoring compliance with the State's visible emissions and particulate matter standards for liquid and gas fired sources. Equipment types covered by these conditions are internal combustion engines, turbines, heaters, boilers, and flares. Initial monitoring frequency schedules are established along with subsequent reductions or increases in frequency depending on the results of the self-monitoring program.

Monitoring frequencies for hydrocarbon fuels, both liquid and gaseous, are detailed in these conditions. The monitoring for gaseous fuels consists of semi-annual certification that only gaseous fuels are used. This is in recognition of the reduced propensity of gaseous fuels to produce particulate matter as a result of combustion.

Reasonable action thresholds are established in these conditions that require the Permittee to progressively address potential visible emission problems from sources either through maintenance programs and/or more rigorous tests that will quantify whether a specific emission standard has been exceeded.

Notification of the department via recordkeeping and reporting requirements are included in these conditions.

Dual fuel fired sources (Source IDs 4-6) are not subject to the liquid fuel monitoring requirements of the standard permit condition until annual operations of the source exceed 400 hours per consecutive twelve-month period on liquid fuel; see Policy Guidance No. AWQ 02-014, Topic # 2.